

# EASTMAN

Eastman Chemical Company  
P.O. Box 511  
Kingsport, Tennessee 37662

## 201-15815

February 18, 2005

Administrator  
US EPA  
PO Box 1473  
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program

**RE: HPV Chemical Challenge Program, AR-201**

Dear Administrator,

This correspondence pertains to the listing of two chemicals as high production volume (HPV) chemicals that Eastman believes should be removed from the list of HPV "orphans" noted by the EPA in the 55<sup>th</sup> ITC Report. The two chemicals in question are isopropyl formate (CAS# 625-55-8) and propanal, 3-hydroxy-2,2-dimethyl- (commonly called hydroxypivaldehyde; CAS# 597-31-9). These two chemicals were reported by Eastman in our 1990 IUR submission. However, it was subsequently determined that they were exempt from needing to be reported and in 1999 a letter was sent into the Agency to correct our submission (Attachment I). Eastman did not report any production for these two chemicals in our 1994 or 1998 IUR submissions. These two chemicals did show up in our 2002 IUR report. However, again it was determined to be a reporting error as nothing associated with their management had changed and they should not have been reported. A letter to amend and correct our 2002 IUR submission has been sent into the EPA (Attachment II).

Eastman is not aware of any other companies who manufacture this material. Accordingly, if there are no other manufacturers, we urge the EPA to amend their records to show that these two chemicals are no longer HPV chemicals or orphans subject to any future TSCA test rules.

Sincerely,

James A. Deyo D.V.M., Ph.D. D.A.B.T.  
Senior Associate  
HPV Program Manager

CC (by email): John Walker EPA  
Diane Sheridan EPA  
Jim Keith ACC

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A Public Commitment

# EASTMAN

Eastman Chemical Company  
P.O. Box 511  
Kingsport, Tennessee 37662

February 16, 2005

OPPT Document Control Officer  
U. S. Environmental Protection Agency  
Office of Pollution Prevention and Toxics (7407M)  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Attn: Amended Inventory Update Rule Report for 2002 for Eastman Chemical Company

Ladies/Gentlemen:

Eastman Chemical Company submitted reports in response to the TSCA inventory update rule for 2002 based on 2001 production.

A routine review of our reports and processes has since determined that two of the chemicals reported should not have been reported for the IUR. The two records incorrectly reported were from Eastman Chemical Company's Longview, TX, site. Please delete the following records from your reports for the reasons cited.

<u>Company Report Number</u>	<u>EPA Report Number (Form U)</u>	<u>Description</u>
TEX2002	65001711	Longview, Texas site

(Please see the attached copy of the acknowledgement letter from EPA for this report.)

<u>CAS No.</u>	<u>Line No.</u>	<u>Name</u>	<u>Reason</u>
597-31-9	39	propanal, 3-hydroxy-2,2-dimethyl-	Nonisolated intermediate
625-55-8	40	formic acid, 1-methylethyl ester	Burned as waste only

If there are questions about this correction, please contact A. James Cox (423) 229-2238.

Very truly yours,

Marc G. Schurgen  
Director, Product Safety and Health  
Eastman Chemical Company  
P.O. Box 511  
Kingsport, TN 37662  
Tel. 423-229-5921

Attachment



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# EASTMAN

Eastman Chemical Company  
P. O. Box 431  
Kingsport, Tennessee 37662

February 22, 1999

OPPT Document Control Officer  
U. S. Environmental Protection Agency  
Office of Pollution Prevention and Toxics (7407)  
401 M Street, S.W.  
Washington, DC 20460

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Attn: Inventory Update Rule

Dear Madam/Sir:

Eastman Chemical Company has recently submitted reports in response to the TSCA inventory update rule.

It has since been determined that three of the chemicals reported should not have been reported for the IUR. All three records incorrectly reported were from Eastman Chemical Company's Longview, TX, site. Please delete the following records from your reports for the reasons cited.

<u>Diskette</u>	<u>Form U</u>	<u>Description</u>	
EMN2	N/A	Longview, Texas site	

  

<u>CAS No.</u>	<u>Line No.</u>	<u>Name</u>	<u>Reason</u>
597-31-9	35	propanal, 3-hydroxy-2,2-dimethyl-	Nonisolated intermediate
625-55-8	36	formic acid, 1-methylethyl ester	Burned as waste only
645-62-5	37	2-hexenal, 2-ethyl-	Nonisolated intermediate

(N/A: to be assigned by the Agency upon receipt)

If there are questions about this correction, please contact me at (423) 229-4274.

Very truly yours,

F. David Petke, Senior Technical Associate  
Product Safety and Stewardship

cc: TSCA IUR File

